

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: \* CASE NUMBER: 11-02541 SEK  
\*  
CASTULO MERCADO ORTIZ \*  
\*  
Debtor(s) \* CHAPTER 13 (ASSET CASE)  
\*\*\*\*\*

APPLICATION FOR ATTORNEY COMPENSATION

TO THE HONORABLE COURT:

COME(S) NOW, Marilyn Valdes Ortega, and respectfully requests interim compensation pursuant to Section 330 of the United States Bankruptcy Code. All services performed and/or expenses incurred were for the benefit of the estate or the administration of the case. As required by Bankruptcy Rule 2016 A, the undersigned attorney on behalf of the aforementioned law firm sets forth a detailed statement of the services rendered, time expend and the amount requested:

CASE ADMINISTRATION CHAPTER 13

DATE	DESCRIPTION	TIME
<b>HOURS</b>		
02/14/2011	Initial interview in which Debtor economic situation and debts are evaluated in order to determine Chapter 13 eligibility, determine plan to be offered to creditors, feasibility of the plan, potential adversary proceedings, information that is required, discuss attorneys fees. Discuss all requirements as per new law and consequences of non compliance.	1.00

02/20/2011	Meet with debtor in order to review documents submitted by debtor who requested to contract us.	1.00
03/28/2011	Organize, discuss, prepare draft and review initial documents that are to be submitted to the court in order to file instant case, once all documents are complete. Draft and proofread Voluntary Chapter 13 Petition.	4.00
03/28/2011	Draft and prepare Chapter 13 Plan dated 3/28/2011.	.30
03/28/2011	Meet with Debtor in Order to explain and reviewed bankruptcy petition and for debtor to sing the Petition and request additional document.	.30
03/28/2011	Draft and proof Read Notice to Individual Consumer Debtor.	.20
03/30/2011	Read Court notice informing that 341 meeting will be held on April 29th, 2011 at 8:00 a.m.	.10
03/31/2011	Draft and prepare initial letter that is sent to debtor in which we inform the requirements of his case and the information and documents that are required, submit copy of automatic stay and Chapter 13 plan, and debtor's payment schedule plan.	.30
03/31/2011	Draft and proofread letter to debtor notifying 341 hearing for creditors has been scheduled for April 29th, 2011 at 8:00 a.m.	.30

04/07/2011	Study Claim #1 filed by Santander Financial d/b/a Island Finance and it's documents.	.10
04/11/2011	Study Claim #2 filed by Banco Popular de Puerto Rico and it's documents.	.10
04/12/2011	Meet with debtor in order to provide for preparation prior to 341 meeting and answer additional questions.	.50
04/20/2011	Draft and proofread Objection to Claim 1 by Santander Financial d/b/a Island Finance.	.30
04/22/2011	Study Claim #3 filed by Internal Revenue Services and it's documents.	.10
04/29/2011	Appearance at 341 meeting out with has a debtor hearing was continued.	1.10
05/02/2011	Read Court notice informing that Continuance 341 meeting will be held on June 9 <sup>th</sup> , 2011 at 8:00 a.m.	.10
05/02/2011	Draft and proofread letter to debtor notifying continuance 341 hearing for creditors has been scheduled for June 9 <sup>th</sup> , 2011 at 8:00 a.m.	.30
05/05/2011	Read Court notice informing that Confirmation hearing has been rescheduled for June 10 <sup>th</sup> , 2011 at 9:00 a.m.	.10

05/19/2011	Study Claim #4 filed by Cooperativa La Sagrada Familia and it's documents.	.10
05/19/2011	Study Claim #5 filed by Cooperativa La Sagrada Familia and it's documents.	.10
05/19/2011	Study Claim #6 filed by Cooperativa La Sagrada Familia and it's documents.	.10
05/24/2011	Read Notice of Appearance and Request for Notice filed by Angel M. Vazquez Bauza.	.10
05/24/2011	Study Claim #7 filed by Banco Bilbao Vizcaya and it's documents.	.10
05/24/2011	Meet with debtor in order to receive Additional documents.	.50
05/24/2011	Draft and proofread Amended Schedule B and Statement of Financial affairs.	.30
05/24/2011	Draft and proofread Amended Chapter 13 Plan dated 5/24/2011.	.30
05/26/2011	Study Amended Claim #3 filed by Internal Revenue Service and it's documents.	.10
06/09/2011	Read Court notice Minutes of 341 Meeting.	.10
06/09/2011	Draft and proofread Motion Requesting Continuance of hearing of confirmation.	.30
06/10/2011	Read Minutes of Hearing Held on 06/10/2011.	.10
06/16/2011	Read Notice setting Hearing to consider the Following: Debtor's Objection to Claim #1, hearing scheduled for 7/29/2011 at 9:00 a.m.	.10

06/16/2011	Draft and prepare letter to debtor with New hearing on confirmation.	.20
06/22/2011	Read Motion Requesting Dismissal Filed by Alejandro Oliveras.	.10
06/22/2011	Inform debtor of Motion to Dismiss by Trustee, terms and consecuenses.	.30
06/23/2011	Read Notice setting hearing to consider the following: Trustees Motion to Dismiss Hearing scheduled 7/29/2011 at 9:00 a.m.	.10
06/29/2011	Read Notice to creditor: the hearing Scheduled for 7/29/2011 at 9:00 a.m. has been rescheduled for 8/16/2011 at 9:00 a.m.	.10
06/29/2011	Phone Conference with debtor to request Pending documents and inform new hearing date.	.30
07/08/2011	Study Claim #8 filed by Department of Treasury and it's documents.	.10
07/08/2011	Study Claim #9 filed by Department of Treasury and it's documents.	.10
08/02/2011	Read Motion Requesting entry of Order of Dismissal filed by Osmarie Navarro Martinez.	.10
08/02/2011	Phone Conference with debtor to inform Entry of Order by Trustee of Motion to Dismiss and consequences.	.20
08/03/2011	Phone Conference with debtor in order to discuss correct amount of expenses.	.30
08/03/2011	Draft and prepare amended Schedule J.	.30

08/09/2011      Draft and proofread this billing report.      1.00

Total Hours    15.70

4. The undersigned attorney contracted that her services should be paid at a rate of \$200.00 per hour. Prior to the confirmation the undersigned received \$525.00 based on the billing report submitted, the undersigned request that this Honorable Court grant additional compensation in the amount of \$2,615.00 with the money on hand with the Trustee to be paid through the plan, for the Trustee to disburse from the balance on hand after Trustee fee, and or the amount on balance after the payment to the Trustee.

5. The applicant has not shared nor agreed to share such compensation with anyone except members or regular associates of our law firm.

**NOTICE**

"Within seven (7) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R.Bank.P.9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is

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filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise".

**VERIFIED STATEMENT**

I hereby certify under penalty of perjury that the above information is correct and services were incurred to the best of my knowledge.

In San Juan, Puerto Rico, this 10 day of August, 2011.

**RESPECTFULLY SUBMITTED.**

/s/ **Marilyn Valdes Ortega**  
MARILYN VALDES ORTEGA  
USDC PR 214711  
P.O. Box 195596  
San Juan, PR 00919-5596  
Tel. (787) 758-4400  
Fax. (787) 763-0144  
E-mail valdeslaw@prtc.net

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

**11-02541-SEK13 Notice will be electronically mailed to:**

MONSITA LECAROZ ARRIBAS  
ustpregion21.hr.ecf@usdoj.gov

ALEJANDRO OLIVERAS RIVERA  
aorecf@ch13sju.com

MARILYN VALDES ORTEGA on behalf of Debtor CASTULO MERCADO ORTIZ  
valdeslaw@prtc.net

**I HEREBY CERTIFY:** That I have mailed by regular mail to all creditors listed.

**11-02541-SEK13 Notice will not be electronically mailed to:**

BANCO BILBAO VIZCAYA ARGENTARIA  
PO BOX 364745  
SAN JUAN, PR 00936

DEPARTAMENTO DEL TRABAJO •  
AVE MUÑOZ RIVERA 505  
HATO REY, PR 00918

BANCO POPULAR DE PR  
PO BOX 366818  
SAN JUAN, PR 00936-6818

FEDERAL LITIGATION DEPT OF  
JUSTICE  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

CITIFINANCIAL RETAIL SERVICES DE  
PR  
PO BOX 71328  
SAN JUAN, PR 00936-8428

ISLAND FINANCE  
D/B/A SANTANDER FINANCE  
PO BOX 362589  
SAN JUAN, PR 00936-2589

CITIFINANCIAL  
PO BOX 71587  
SAN JUAN, PR 00936

LCDA. MARIA ELIZA SANTIAGO  
PO BOX 25249  
SAN JUAN, PR 00928-5249

COOPERATIVA LA SAGRADA FAMILIA  
PO BOX 102  
COROZAL, PR 00783-0102

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
OFICINA 424 B  
SAN JUAN, PR 00902-4140